

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
ABERDEEN DIVISION

TATIANA (TANYA) SHERMAN

PLAINTIFF

V.

CIVIL ACTION NO. 1:21-CV-190-GHD-DAS

ITAWAMBA COMMUNITY COLLEGE;  
JOE LOWDER; TZER NAN WATERS;  
AND DR. JAY ALLEN

DEFENDANTS

**MOTION OF DEFENDANT JOE LOWDER TO JOIN DEFENDANTS ITAWAMBA  
COMMUNITY COLLEGE, TZER NAN WATERS AND DR. JAY ALLEN MOTION  
FOR SUMMARY JUDGMENT AND MEMORANDUM BRIEF IN SUPPORT FOR  
SUMMARY JUDGMENT**

COMES NOW, Defendant, Joe Lowder (hereinafter “Defendant Lowder”), by and through counsel of record and pursuant to F.R.C.P. 56 and L.U.Civ.R.7 files his *Motion to Join Defendants Itawamba Community College, Tzer Nan Waters and Dr. Jay Allen’s Motion for Summary Judgment and Memorandum Brief in Support of Summary Judgment* and would show the Court as follows:

1. Defendant Lowder’s argument and position on facts, law, supporting memorandum and exhibits mirror his three Co-Defendants’ *Summary Judgment Motion* (Doc. #88) and *Memorandum Brief in Support of Defendants’ Motion for Summary Judgment* (Doc. #89) filed on May 31, 2023.

2. Arguments and position on facts, law, supporting memorandum and exhibits of all Co-Defendants apply to each Co-Defendant.

3. Allowing Defendant Lowder to join *Defendants Itawamba Community College, Tzer Nan Waters and Dr. Jay Allen’s Motion for Summary Judgment and Memorandum Brief in Support of Summary Judgment* would prove to streamline legal issues and result in greater judicial economy.

**WHEREFORE, PREMISES CONSIDERED,** Defendant Lowder requests that this Court enter an Order granting his request to join *Defendants Itawamba Community College, Tzer Nan Waters and Dr. Jay Allen's Motion for Summary Judgment and Memorandum Brief in Support of Summary Judgment* **RESPECTFULLY SUBMITTED**, this the 1<sup>st</sup> day of June, 2023.

**JOE LOWDER, DEFENDANT**  
BY: /s/ Daniel H. Sparks  
ATTORNEY FOR DEFENDANT  
JOE LOWDER

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**CERTIFICATE OF SERVICE**

I, Daniel H. Sparks, hereby certify that I have electronically filed the foregoing document with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record.

THIS the 1<sup>st</sup> day of June, 2023.

/s/ Daniel H. Sparks  
Attorney for Defendant Joe Lowder